

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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APRIL BROWN *and* SHARI BURANONDHA, *each*
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

FORCE ONE INTERNATIONAL SECURITY, INC. FKA
FORCE ONE INTERNATIONAL SECURITY &
CONSULTANT FIRM, INC., AHMED SHAHEED, Sr. AKA
AHMED SHAHEED, Sr., *and* AHMAD SHAHEED, Jr. AKA
AHMED SHAHEED, Jr.,

Defendants.
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**Notice of Motion for
Default Judgment**

14 Civ. 2614 (NGG)(LB)

Plaintiffs April Brown and Shari Buranondha, each individually and on behalf of all others similarly situated respectfully move the Court pursuant to FED. R. CIV. P. 55(b) and L. Civ. R. 55.2 to enter default judgment in favor of Plaintiffs and against Corporate Defendant Force One International Security, Inc., FKA Force One International Security & Consultant Firm, Inc., and the Individual Defendants Ahmad Shaheed, Sr. AKA Ahmed Shaheed, Sr., and Ahmad Shaheed, Jr. AKA Ahmed Shaheed, Jr. on the grounds that Defendants failed to answer or otherwise defend against the Complaint.

Dated: New York, New York
July 30, 2014

By: THE HARMAN FIRM, PC

s/ Walker G. Harman, Jr.
Walker G. Harman, Jr. [WH-8044]
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To: Force One International Security, Inc.
Ahmad Shaheed, Sr.
Ahmad Shaheed, Jr.
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